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To: <fb4p@oce.usda.gov>
Date: Wed, Dec 6, 2006 7:27 AM
Subject: RIN 0503-AA32

Mr. Marvin Duncan
USDA, Office of the Chief Economist
Office of Energy Policy and New Uses
Room 4059, South Building
1400 Independence Avenue, SW
MS-3815
Washington, DC 20250-3815

By email

RE: RIN 0503-AA32, Round 4 Proposed Designations of Items

Dear Mr. Duncan:

The Office of the Federal Environmental Executive appreciates the opportunity to provide public comments on the Round 4 proposed designations of biobased products. OFEE supports the effort to create markets for biobased products and, thereby, demonstrate their performance and availability, create additional markets for agricultural crops and by-products, create jobs and, ultimately, reduce U.S. dependence on petroleum. We also appreciate U.S. Department of Agriculture{WP4,28}'s efforts to create a model affirmative procurement program, upgraded web site, and other tools to assist agencies in purchasing the designated products.

We have several comments on the biobased content levels, product availability from affiliates of the National Industries for the Blind (NIB), and information on environmental and public health benefits.

Biobased Content Levels. Sections 9002(c) and (g) of the Farm Security and Rural Investment Act require Federal agencies to purchase USDA-designated biobased products containing the highest percentage of biobased products practicable. Section 9002(e) requires USDA to recommend the level of biobased material to be contained in the products. Since USDA{WP4,28}'s recommendations are guidance to the agencies for purchasing the designated products, it follows that the recommend biobased content levels should be the maximum practicable. OFEE believes that for two of the products to be designated in Round 4, USDA should either recommend higher biobased content levels or recommend multiple content levels based on differences in product usage or other characteristics.

Cutting, drilling, and tapping oils {WP4,33} The proposed content level is 64 percent. However, based on the information in the preamble and data in the background information posted on the USDA web site, the differences in content levels reflect differences in use or viscosity. USDA should provide separate recommended content levels for the various uses or viscosities.

Firearm lubricants {WP4,33} The proposed content level is 49 percent. However, based on the information in the preamble, there are different formulations based on use. Rather than recommending a lower content level to cover both general and special uses, USDA

should recommend two content levels for general purpose and cold weather applications.

Product Sources. As USDA notes in the preamble to the proposed rule, NIB affiliates offer biobased products. During the November, 2006, meeting of the Executive Order 13101 Interagency Advisory Group, NIB provided information on the following biobased cleaning products; OFEE recommends that USDA provide this information in the final rule for the benefit of the Federal agency purchasers implementing both this round of biobased products and earlier biobased product designations:

BioRenewables Glass Cleaner, NSN 7930-00-NIB-0331 (2 liter) and 7930-00-NIB-0330 (gallon)

BioRenewables Restroom Cleaner, NSN 7930-00-NIB-0437

BioRenewables Graffiti Remover SAC, NSN 7930-00-NIB-0433 (quart) and 7930-00-NIB-0434 (gallon)

BioRenewables Waterless Hand Cleaner, NSN 8520-00-NIB-0093

BioRenewables Waterless Plus Hand Cleaner, NSN 8520-00-NIB-0094

TriBase Multi Purpose Cleaner, NSN 7930-00-NIB-0329

Lite{WP4,28}n Foamy Sunflower Fresh foaming hand, hair, and body wash

Information on Environmental and Public Health Benefits. OFEE supports USDA{WP4,28}s use of analyses from the BEES model in evaluating products for possible designation. However, OFEE does not agree with USDA that simply providing agencies with tables summarizing BEES analyses satisfies the statutory requirement that USDA provide agencies with information on the public health and environmental benefits of biobased products. The summary tables included in the preamble to the proposed products designation rule do not provide useful information to agencies, because the information is not provided in the context of comparisons with non-biobased products. For example, is a BEES environmental performance total score of 0.0130 for a bath and tile cleaner good, bad, or neutral? There is no way of knowing without knowing the scores of competing, petroleum-based items items.

OFEE recommends that USDA provide narrative information and comparative reference points on the environmental and public health benefits of the designated products. This information can be provided in the technical background documents on the USDA web site or in case studies on the web site. Examples of information that could help make a {WP4,32}best value{WP4,31} determination include the absence of toxic or hazardous constituents found in competing non-biobased products, biodegradability, neutral pH, and whether or not the product must be handled as a hazardous waste or non-hazardous waste at the end of its useful life.

For example, National Parks, the Department of the Interior headquarters building, several Department of Energy laboratories, and USDA{WP4,28}s Beltsville Agricultural Research Center were early adopters of green cleaning products, including biobased products. They can provide information on the health and environmental benefits they have experienced while using biobased cleaning products.

In summary, OFEE believes that USDA continues to make good progress in implementing the biobased products purchasing program. OFEE looks forward to working with USDA on implementation of this program and increasing Federal agency procurement of biobased products.

Sincerely,

Edwin PiZero
Federal Environmental

Executive